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Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission 445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. Section 160(c); WC Docket No. 18-141; Category 1

Dear FCC:

I hope that you will deny USTelecom's petition. The petition claims that ILECs face "robust intermodal competition," and that forbearance would "free capital for deploying broadband networks and advanced services." The petition claims that consumers would save money if the petition is granted. I believe these statements are false. Granting the petition would remove competitive small businesses from the market, reducing quality and increasing cost.

In my area, AT&T and Comcast are the only two wireline residential internet providers with their own physical networks. AT&T offers a 5 megabit per second DSL line for \$50 per month, and Comcast offers a 15 megabit cable line for the same price. In a competitive environment, one company offering a slower product would have to charge less for it, but that doesn't appear to be happening. This doesn't seem unusual; at my previous residence (approximately 2500 miles away) Verizon and Comcast also charged almost exactly the same amount of money for very different Internet speeds. The claim that ILECs face "robust competition" seems dubious in my observation.

Forbearance may "free capital for deploying broadband networks," but actual

service provided would not necessarily improve, nor would prices necessarily decrease. For instance, AT&T offers 5 megabit DSL for \$50 per month and – in some areas – 50 megabit fiber for the same price. This sounds good, but in the fine print, AT&T notes that both of these services are limited to the same amount of data transferred per month, one terabyte. On an average basis this is only 3.3 megabits per second. Comcast has chosen the same limit for most of its services.

As to the claim that customers would save money if forbearance is granted, I should point out that AT&T's residential fiber plans without data limits begin at \$80 per month. Google Fiber costs \$70 per month, and the fiber provider at my previous address charged \$90 per month. Frequently, fiber rollouts seem to be an excuse to charge more money, not less.

In closing, I'd like to make a comment about the Internet Service Provider I use in Millbrae, CA. Raw Bandwidth Communications, Inc. is a small business based in San Bruno, CA, and it offers 12 megabits per second for \$40 per month with no data limit. This is three-and-a-half times the monthly data at four-fifths of the price of competing plans from AT&T and Comcast. Raw Bandwidth makes extensive use of UNEs and collocation services available from AT&T at regulated rates, and granting USTelecom's petition would threaten Raw Bandwidth and similar small businesses offering higher-quality and lower-cost services than the incumbents. These services provide valuable competition at the low-cost end of the pricing spectrum, a category that the incumbents seem to ignore.

I ask again that you deny USTelecom's request for forbearance.

Thank you for your time and attention,

A handwritten signature in black ink, appearing to read "Ben Guzzardi". The signature is fluid and cursive, with the first name "Ben" being more prominent than the last name "Guzzardi".

Ben Guzzardi